IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

| RUSSELL BRAMMER, | : : | |
|--------------------------------|--------|--------------------------------|
| Plaintiff, | : | |
| v. | : | Civil Action No.: 1:17-CV-1009 |
| VIOLENT HUES PRODUCTIONS, LLC, | : | |
| Defendant. | : : | |
| | : | |

PLAINTIFF'S RULE 26(A)(3) PRETRIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(3) and the Pretrial Conference Order entered December 1, 2017 (ECF No. 15), Plaintiff Russell Brammer hereby makes the following disclosures:

1. RULE 26(A)(3)(i): IDENTIFICATION OF WITNESSES

a. Witnesses Plaintiff Expects to Present

Plaintiff may call the following witnesses at trial:

- i. Russell Brammer
- ii. Fernando Mico
- b. <u>Witnesses Plaintiff May Call if the Need Arises</u>

Plaintiff expects to call the following witnesses at trial:

- i. Any and all witnesses identified by Defendant.
- ii. Any and all witnesses called by Defendant.
- iii. Any impeachment and rebuttal witnesses as necessary.
- iv. Any custodian of records necessary to authenticate documents.

2. RULE 26(A)(3)(A)(iii): IDENTIFICATION OF EXHIBITS

Plaintiff expects to offer or utilize the exhibits and/or documents identified in the accompanying $\underline{\textbf{Exhibit 1}}$.

Dated: April 19, 2018 Respectfully submitted,

RUSSELL BRAMMER

By: /s/ David C. Deal
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CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2018, I filed a copy of the foregoing with the Clerk of the Court via CM/ECF, which will send a notice of electronic filing to all registered users listed below:

Thomas P. Weir KIRKLAND & ELLIS LLP 655 Fifteenth Street NW Washington, D.C. 20005 Telephone: (202) 879-5000 Counsel for Defendant

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